

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DANNY R. TEAGLE and JESUS SALAZAR, JR., individually and on behalf of all others similarly situated,

Plaintiffs,

V.

**LEXISNEXIS SCREENING
SOLUTIONS, INC., formerly
known as CHOICEPOINT'S
WORKPLACE SOLUTIONS, INC.,**

Defendant.

No. 1:11-CV-1280-RWS-JSA

Jury Trial Demanded

**PLAINTIFF'S MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT
AND RELATED ORDERS**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiff Danny R. Teagle moves for preliminary approval of the class action settlement agreement reached between he and Defendant LexisNexis Screening Solutions, Inc. Plaintiff also moves the Court for orders related to the preliminary approval of the settlement.

Specifically, Plaintiff requests:

1. An order granting preliminary approval of the settlement in this action (“the Settlement”) on the terms and conditions set forth in the Settlement Agreement (the “Agreement”), a true and correct copy of which is attached as Exhibit 7 to the Declaration of Craig C. Marchiando, served and submitted to the Court concurrently herewith;

2. An order conditionally certifying the Classes as national class actions for settlement purposes only;

3. An order setting a Final Approval/Fairness Hearing, to be held on a date to be determined by the Court, in the United States District Court for the Northern District of Georgia, to consider final approval of the Settlement, entry of judgment pursuant to the Settlement, Class Counsel’s application for an award of attorneys’ fees, administration, and litigation expenses, and Plaintiff’s application for a service award, all as set forth in the Agreement and Preliminary Approval Order; and all other related issues which the Court deems necessary and proper;

4. An order approving the proposed form, content and manner of dissemination of the Notices attached as Exhibits 3 and 4 to the Marchiando Declaration (hereinafter, the “Class Notices”), and directing the settling parties to publish the Notices, as set forth in the Agreement and [Proposed] Order Granting

Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Related Orders ("Preliminary Approval Order");

5. An order establishing the procedures and deadlines for requesting exclusion from the Class, objecting to the Settlement, appearing at the final fairness hearing, and presenting evidence at the final fairness hearing, all as set forth in the Agreement and Preliminary Approval Order;

6. An order retaining continuing jurisdiction over the settlement proceedings, to ensure the effectuation thereof in accordance with the Agreement, and Preliminary Approval Order; and

7. Such related orders and findings as are set forth in the Preliminary Approval Order, served and submitted herewith.

This Motion is made, pursuant to the Agreement, on the grounds that the proposed Settlement reached by the Parties hereto is a fair, adequate, and reasonable settlement of this action, and falls within the range of possible final approval such that dissemination of class notice is appropriate.

This Motion is based on this Notice of Motion; Memorandum of Law; the supporting Declarations of Michael A. Caddell, Craig C. Marchiando, and Danny R. Teagle, filed concurrently herewith; the Settlement Agreement and Exhibits

attached thereto, served and filed concurrently herewith; and the complete record in this action.

The Parties hereby stipulate, should the Court deem it appropriate, that this Motion is appropriately decided on the papers and without oral argument.

Dated: April 12, 2013.

/s/ Michael A. Caddell
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Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

The foregoing document complies with the typeface requirements of Local Rule 5.1C and the type style requirements of Local Rule 5.1C(3) using Times New Roman 14 point font.

/s/ Michael A. Caddell
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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2015, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

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/s/ Craig C. Marchiando
Craig C. Marchiando

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